



James E. Taylor High School

Jeff Stocks, Principal



Date: 1/14/15

Dear FCC,

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 via Electronic Filing

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch,

On behalf of James E. Taylor HS Theatre Department and Performing Arts Center, in Katy, Texas, I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

James E. Taylor HS Theatre/Fine Arts Department and the associated Performing Arts Center present together up to 40-50 public performances a year, with more than 15,000 attendees annually. Our school theatre program relies on the revenue generated from their performances to sustain and grow our in- and after-school theatre education opportunities for all of our 250 theatre students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my school and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.





Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

[The FCC is seeking the following information from performing arts organizations and educational institutions; answer as many questions as you can, with accuracy and insert the information here in narrative/bullet form:

- What type of wireless devices do you use?
 - Wireless Microphones
 - in-ear communications (IFBs)
 - equipment controlling devices (not transmitting sound)
- How many units do you use in a typical presentation or performance? In between the 2 performing spaces a total 30-45 wireless units are in use.
- How frequently do you offer presentations that use wireless devices? 90 % of the combined total performances of the Theatre Department and Performing Arts Center will use wireless devices.
- What bands and channels do you use?
 - High UHF (channels 38-51, the 600 MHz band, 614 MHz to 698 MHz)
 - 902MHz-928MHz Frequency Bands
 - Are your microphones able to tune to more than one frequency? Yes
 - How wide is their tuning ability? This will vary depending on the Manufacturer and model of the wireless set.
 - Which of your devices are outside the TV bands? Less than ¼ of the total Wireless devices used operate outside the TV band frequencies.
 - What frequencies do they use? Those outside of the TV frequency band operate in the 902MHz-928MHz range
- Which of your wireless devices are analog and which are digital? ¾ of the current Wireless Units are Analog
- Do you own or rent your wireless equipment? Both, depending on the event and it's requirements
- For equipment that you own, what is its reasonable life expectancy? 5-7 Years
- How did you handle the move out of the 700 MHz band? All of the Wireless in that range had to be removed and alternate wired methods had to be used until funds could be found to replace them. This not only included the Theatre Department and Fine Arts Center, but the school Athletic Departments and Units used in LGI (Large Group Instructional rooms)
 - How much did it cost? The Theatre and Performing Arts Center replacement cost was close to \$35,000
 - How long did it take for you to retune or replace all of your devices? Due to budgetary restrictions it took up to 4 years to get most of the Microphones replaced throughout the campus.





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Katy Independent School District

- What can the FCC do to ensure that wireless microphone users transition to new, more efficient devices to the full extent possible? Partial funding programs for new Digital Wireless Devices (Microphones, Wireless Intercom's, and Non audio wireless) purchased by the schools to help offset the replacement costs.
- What would persuade you to move out of the TV band? Assistance with funding to replace current wireless devices (as indicated above) currently in the proposed restricted frequency range so that any future District/campus based funding can be used to provide new usage required wireless devices instead of replacement purchases.

I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—that some sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21st-century skills and knowledge for students and providing pride, entertainment, and dialogue in the communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,

Charlie H. Woods

James E. Taylor High School

Theatre Department Technical Director

Performing Arts Center Director

